

Connell Foley LLP  
875 Third Avenue  
21<sup>st</sup> Floor  
New York, NY 10022  
P 212.307.3700 F 212.542.3790

**Michael Bojbasa**  
Of Counsel  
212-307-3703  
MBOJBASA@CONNELLFOLEY.COM

January 19, 2024

**VIA ECF**

Magistrate Judge Taryn A. Merkl  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Yasharpour v. Target Corporation**  
**Docket No.: 23 CV 06477(PKC)(TAM)**

Dear Judge Merkl:

We are the attorneys for Target Corporation ("Target") in the referenced matter and write on behalf of both parties to provide the Court with a status report.

The parties served their initial requests for the production of documents and sets of interrogatories on each other. Both parties have also responded to the initial sets of demands that were served. Plaintiff's medical treatment records have been obtained through the HIPAA authorizations that were provided to Target.

The parties are planning to proceed forward with discovery, including party depositions, with Plaintiff's deposition scheduled to take place on January 25<sup>th</sup>. There have been no settlement discussions held to date and the parties do not seek a referral to mediation or a settlement conference at this point in time.

Your Honor's consideration of this matter is greatly appreciated.

Respectfully,

*Michael Bojbasa*

Michael Bojbasa

cc: **VIA ECF & E-MAIL**  
Isaac Tessler, Esq.  
*Attorney for Plaintiff*  
305 Broadway, Suite 700  
New York, New York 10007  
[isaactessler@optonline.net](mailto:isaactessler@optonline.net)